

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

BILLJCO, LLC	)	
	)	CASE NO: 2:21-cv-00181-JRG
v.	)	(Lead Case)
	)	
CISCO SYSTEMS, INC.	)	
	)	
	)	

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BILLJCO, LLC	)	
	)	
v.	)	CASE NO: 2:21-cv-00183-JRG
	)	(Member Case)
HEWLETT PACKARD ENTERPRISE	)	
COMPANY, ARUBA NETWORKS, LLC	)	
	)	
	)	

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**UNOPPOSED MOTION TO AMEND BRIEFING SCHEDULE FOR DEFENDANTS  
HEWLETT PACKARD ENTERPRISE COMPANY AND ARUBA NETWORKS, LLC’S  
MOTION TO TRANSFER VENUE**

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Plaintiff BillJCo, LLC (“Plaintiff”) moves the court for an Order amending the briefing schedule for Defendants Hewlett Packard Enterprise Company and Aruba Networks, LLC’s (“Defendants”) Motion to Transfer Venue Pursuant to 28 U.S.C. § 1404(a) (Dkt. 33) filed on October 1, 2021. Defendants are unopposed to this request.

Defendants’ Motion to Transfer present factual issues about the evidence and witnesses that will be relevant to this case and the location(s) of such evidence and witnesses. Because of these issues, Plaintiff anticipates serving venue discovery on Defendants consisting of interrogatories, requests for production, and deposition notices related to certain facts surrounding the transfer arguments raised by Defendants.

Accordingly, Plaintiff asks that the Court enter an Order allowing for each side to propound the following discovery related to venue:

- 5 Interrogatories with responses due 20 days after service,
- 10 Requests for Production with responses due 20 days after service, and
- 10 hours of deposition testimony.

The parties have agreed that venue discovery will not count against the discovery limitations agreed upon in the Discovery Order. Additionally, to permit time to complete the requested venue discovery, Plaintiff respectfully requests that the parties serve all venue discovery requests by November 19, 2021, and complete venue discovery not later than January 14, 2022. Further, Plaintiff requests that its time to file a response to Defendants' Motion be extended to two weeks after venue discovery is complete, and that Defendants Reply be due one week after Plaintiff's Response. In the interest of avoiding delay, Plaintiff further requests that non-venue discovery not be stayed during this time.

The parties have met and conferred, and Defendants are unopposed to the relief requested in this motion. Accordingly, Plaintiff requests the Court enter the attached proposed order.

Dated: October 15, 2021

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**ATTORNEYS FOR BILLJCO, LLC**

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this motion was served on all counsel of record who have consented to electronic service on this 15th day of October, 2021.

/s/ Brian Michalek